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Group, INC., and Cenlar FSB*

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION**

GEORGE CALCUT AND GERI CALCUT

Plaintiffs,

v.

PARAMOUNT RESIDENTIAL
MORTGAGE GROUP, INC.,

AND

CENLAR FSB

Defendants.

Case No. 2:22-cv-01215

**NOTICE OF SERVICE OF
DEFENDANTS' AMENDED
PRETRIAL DISCLOSURES**

Defendants Paramount Residential Mortgage Group, Inc. ("PRMG") and Cenlar FSB ("Cenlar"), through their undersigned counsel, hereby give notice that, on June 5, 2023, they served Defendants' Amended Pretrial Disclosures to Plaintiffs' counsel via electronic mail, pursuant to Rules 26(a)(3) of the Federal Rules of Civil Procedure.

DATED this 5th day of June, 2023.

Respectfully submitted,

s/ G. Benjamin Milam

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following and also served the foregoing by electronic mail on the following:

Justin Johanson, Esq.

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PARAMOUNT RESIDENTIAL
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Defendants.

Case No. 2:22-cv-01215

**DEFENDANTS' AMENDED
PRETRIAL DISCLOSURES**

Defendants Paramount Residential Mortgage Group, Inc. ("PRMG") and Cenlar FSB ("Cenlar") (collectively "Defendants"), through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's Rule 16 Scheduling Order (ECF No.10) serve and file the following Amended Pretrial Disclosures:

I. Defendant's Witness List:

A. Defendants expect to present the following witnesses at trial:

- a. Raymond Crawford
c/o G. Benjamin Milam
Truist Center
214 North Tryon Street, Ste. 3700
Charlotte, NC 28202

1 Telephone: (704) 338-6000

2 b. Christy Christensen
3 c/o G. Benjamin Milam
4 Truist Center
5 214 North Tryon Street, Ste. 3700
6 Charlotte, NC 28202
7 Telephone: (704) 338-6000

8 B. Defendants may present the following witnesses at trial if the need arises:

9 c. Derek W. Royster, CPA/ABV/CFF, CFE
10 6000 Fairview Road, Suite 1200
11 Charlotte, NC 28210
12 (704) 227-0777

13 d. George Calcut
14 c/o Brent S. Snyder
15 2125 Middlebrook Pike
16 Knoxville, TN 37921-5855
17 Telephone: (865) 546-2141

18 e. Geri Calcut
19 c/o Brent S. Snyder
20 2125 Middlebrook Pike
21 Knoxville, TN 37921-5855
22 Telephone: (865) 546-2141

23 f. Laurie Cathers
24 Psychological Pathways
25 2500 S Power Rd, Building 2,
26 Mesa, Arizona 85209

27 g. Kristen Betz
28 10557 E. Balmore Ave,
Mesa, AZ 85208
(480) 338-8508

h. Lori Murray
10660 E. Willow Drive,
Cornville, AZ 86325

h. Jessica Heintz, DO
Honor Health Medical Group

3311 N. 44th St.
Phoenix, AZ 85018

i. Ira H. Ungar, MD
Honor Health Medical Group
3311 N. 44th St.
Phoenix, AZ 85018

j. Records Custodian of LoanDepot
300 W. Clarendon Ave., Suite 240,
Phoenix, AZ 85013

k. Records Custodian of CitiBank, N.A.
1400 Citi Cards Way
Jacksonville, FL 32258

l. Records Custodian of Synchrony Bank
170 West Election Road, Suite 125
Draper, UT 84020

m. Records Custodian of Equifax Information Services
8825 N. 23rd Avenue, Suite 100,
Phoenix, AZ 85021

n. Records Custodian of Transunion, LLC
8825 N. 23rd Avenue, Suite 100,
Phoenix, AZ 85021

o. Records Custodian of Experian Information Services LLC
3800 N. Central Avenue, Suite 460
Phoenix, AZ 85012

p. Records Custodian of Honor Health Medical Group
3800 N. Central Ave., Ste. 460
Phoenix, AZ 85012

q. Records Custodian of Broker Solutions, Inc. d/b/a New American Funding
8825 N. 23rd Avenue, Suite 100
Phoenix, AZ 85021

r. Records Custodian of United Trust Bank
8028 S. Harlem,
Palos Heights, IL 60455

C. Defendants reserve the right to call persons not listed above for purposes of impeachment or to rebut the testimony of any of the witnesses called by Plaintiffs. Defendants further reserve the right to call any witnesses listed by Plaintiffs in their Pretrial Disclosures.

II. Deposition Designations:

A. Defendants expect to present the testimony of the following witnesses by deposition:

1. George Calcut

Defendants' Designations	Plaintiffs' Designations	Plaintiffs' Counter-Designations	Defendants' Objections to Plaintiffs' Counter-designations
9:5–21			
9:24–10:13			
15:2–19:19			
20:21–21:7			
23:10–25:19			
26:20–27:11			
35:1–36:3;			
36:16–37:1			
37:2–39:12;			
40:13–42:8			
46:8–48:6			
64:12–16			

66:16–67:1			
67:8–68:15			
83:21–86:15			
92:23–93:5			
95:6–97:5			
101:6–103:22			
106:2–107:6			
109:9–112:20			
114:9–115:15			
118:24–120:15			

2. Geri Calcut

Defendants’ Designations	Plaintiffs’ Designations	Plaintiffs’ Counter- Designations	Defendants’ Objections to Plaintiffs’ Counter- designations
10:23–11:2			
11:9–12:1			
12:25–14:12			
15:7–16:9			
19:20–21:4			
21:16–21:23			
30:13–32:4			
36:3–36:22			

41:11–46:25			
49:11–24			

3. Lori Murray

Defendants’ Designations	Plaintiffs’ Designations	Plaintiffs’ Counter- Designations	Defendants’ Objections to Plaintiffs’ Counter- designations
19:25-28:11			

4. Kristen Betz

Defendants’ Designations	Plaintiffs’ Designations	Plaintiffs’ Counter- Designations	Defendants’ Objections to Plaintiffs’ Counter- designations
32:23-34:16			
37:3–38:6			
38:24–39:4			
42:18–43:11			
45:7–48:13			
57:6–59:15			
60:23–71:20			
72:10–74:6			
79:13–80:13			

89:23-90:14			
98:21-100:19			
102:9-105:13			
105:14-106:7			

5. Laurie Cathers

Defendants' Designations	Plaintiffs' Designations	Plaintiffs' Counter-Designations	Defendants' Objections to Plaintiffs' Counter-designations
23:23-26:24			
51:1-53:25			
60:15-93:5			
94:5-95:3			
96:14-97:1			

B. Defendants reserve the right to present additional deposition testimony at trial to the extent any witness becomes unavailable to testify at trial.

C. Defendants reserve the right to use additional deposition testimony for purposes of impeachment, rebuttal, or to refresh the recollection of any witness called to testify at trial.

III. Exhibits

A. Defendants expect to offer the following exhibits at trial:

Exhibit #	Description	Identified by	Admitted
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1	September 28, 2021 Response to Inquiry	CENLAR 000009 - CENLAR 000010	
2			
3	October 24, 2021 Response to Inquiry	CENLAR 000011 - CENLAR 000012	
4			
5	Letter regarding forbearance options dated November 4, 2020	CENLAR 000119 - CENLAR 000125	
6			
7	Letter regarding options post-forbearance dated March 9, 2021	CENLAR 000131 - CENLAR 000134	
8			
9	Letter regarding forbearance extension and options post-forbearance dated March 15, 2021	CENLAR 000136 - CENLAR 000140	
10			
11	Letter regarding options post-forbearance dated May 3, 2021	CENLAR 000141 - CENLAR 000144	
12			
13	Letter regarding forbearance extension and options post-forbearance dated May 11, 2021	CENLAR 000145 - CENLAR 000150	
14			
15	Letter stating Plaintiffs had been approved for a Disaster Modification dated June 1, 2021	CENLAR 000151 - CENLAR 000153	
16			
17	Letter stating Plaintiffs had been approved for a Disaster Modification and providing Next Steps dated June 1, 2021	CENLAR 000154 - CENLAR 000163	
18			
19			
20	Audio Recording of Phone call dated May 28, 2021	CENLAR 000629	
21			
22	Letter regarding account status reporting dated August 4, 2021	CENLAR 000167 - CENLAR 000168	
23			
24	Letter regarding completion of trial payments dated August 31, 2021	CENLAR 000169 - CENLAR 000176	
25			
26	Letter regarding Modification Offer dated September 3, 2021	CENLAR 000251 - CENLAR 000266	
27			
28	Letter confirming receipt of Plaintiffs inquiry dated September 22, 2021	CENLAR 000181 - CENLAR 000182	

15	ACDV Response	CENLAR 000219 - CENLAR 000221	
16	ACDV Response	CENLAR 000222 - CENLAR 000224	
17	ACDV Response	CENLAR 000225 - CENLAR 000227	
18	ACDV Response	CENLAR 000228 - CENLAR 000230	
19	Executed Loan Modification Agreement	CENLAR 000269 - CENLAR 000280, CENLAR 000291 - CENLAR 000302	
20	April 17, 2020, Closing Disclosures	CENLAR 000332 - CENLAR 000337	
21	April 17, 2020, Note	CENLAR 000347 - CENLAR 000349	
22	April 17, 2020, Deed of Trust	CENLAR 000373 - CENLAR 000381	
23	March 16, 2020, Residential Loan Application	CENLAR 000392 - CENLAR 405	
24	July 15, 2022, Experian Reporting Summary	CENLAR 000419	
25	Account Notes	CENLAR 000420 - CENLAR 000478	
26	August 5, 2021, Letter to borrower regarding investigation into CFPB Complaint	CENLAR 000479; PRMG 000749	
27	October 26, 2021, Letter to borrower regarding investigation into CFPB Complaint	CENLAR 000480, PRMG 000748	
28	August 5, 2021 CFPB Complaint Response	CENLAR 000481, PRMG 749	

29	October 26, 2021 CFPB Complaint Response	CENLAR 000480, PRMG 000748	
30	CFPB Complaint No. 210909-7233352	CENLAR 000543 - CENLAR 000547; CENLAR 000596 - CENLAR 000600	
31	CFPB Complaint No. 210724-6973359	CENLAR 000601 - CENLAR 605	
32	United Trust Bank Closing Statement	CALCUT 000841	
33	LoanDepot - Statement of Credit Denial dated October 24, 2021	loanDepot_Calcult_000061 - loanDepot_Calcult_000064	
34	New American Funding - Affidavit of Custodian of Records	New American 0001	
35	Statement of Credit Denial dated December 3, 2021	New American 0003 - New American 0006	
36	Chapter 5 of VA Handbook	Produced by Plaintiff's Without Bates Label; https://www.benefits.va.gov/WARMS/M26_4.asp	
37	New American Funding - Conversion Log Entries	New American 0889 - New American 0897	
38	United Trust Bank Closing Disclosures dated May 27, 2022	United Trust 0001 - United Trust 0006	
39	United Trust Note	United Trust 0011 - United Trust 0015	
40	United Trust Deed of Trust	United Trust 0016 - United Trust 0032	
41	United Trusts Loan Application dated May 31, 2022	United Trust 0035 - United Trust 0049	
42	United Trust Credit Score Notice	United Trust 0092 - United Trust 0097	

43	Covid 19 Employment and Debt Certification dated April 17, 2020	CALCUT 000269 - CALCUT 000271	
44	United Trust Bank Credit Score Notice to Geri Calcut dated April 27, 2022	CALCUT 000967	
45	United Trust Bank Credit Score Notice to George Calcut dated April 27, 2022	CALCUT 000969	
46	Transunion Credit Report of George Calcut dated August 18 2021	TU 31 - TU 42	
47	Transunion CRS3 ACDV3 Responses dated September 9, 2021	TU 72	
48	Transunion letter to George Calcut regarding investigation into dispute dated September 19, 2021	TU 74 - TU 83	
49	TransUnion Certification and Waiver dated February 7, 2023	Produced by Plaintiff's Without Bates Label	
50	Equifax Declaration of Custodian of Records dated January 20, 2023	CALCUT 001214 - CALCUT 001215	
51	Equifax FACT Trade Update Notification	CALCUT 001272 - CALCUT 001274	
52	Equifax Consumer Dispute Verification	CALCUT 001275 - CALCUT 001283	
53	Equifax Credit Report of George Calcut dated October 28, 2021	CALCUT 001284 - CALCUT 001289	
54	Equifax FACT Trade Update Notification	CALCUT 01290 - CALCUT 001293	
55	Equifax Consumer Dispute Verification	CALCUT 001293 - CALCUT 001301	
56	Experian Declaration of records Custodian dated March 14, 2023	Produced Without Bates Label	

57	Experian Credit Report of George Calcut dated July 23, 2021	EXP.CALCUT_000049 - EXP.CALCUT_0000060	
58	Experian Credit Report of George Calcut dated September 1, 2021	EXP.CALCUT_000061 - EXP.CALCUT_0100072	
59	Experian Credit Report of George Calcut dated August 25, 2021	EXP.CALCUT_000085 - EXP.CALCUT_000096	
60	Experian Credit Report of George Calcut dated November 29, 2021	EXP.CALCUT_000097 - EXP.CALCUT_000108	
61	Experian Credit Report of George Calcut dated October 4, 2021	EXP.CALCUT_000109 - 120	
62	Experian Credit Report of George Calcut dated August 9, 2021	EXP.CALCUT_000121 - EXP.CALCUT_000132	
63	Experian Credit Report of George Calcut dated September 7, 2021	EXP.CALCUT_000157 - EXP.CALCUT_000168	
64	Experian Credit Report of George Calcut dated August 17, 2021	EXP.CALCUT_000259 - EXP.CALCUT_000268	
65	Experian Consumer Assistance CAPS (ACDV Response)	EXP. CALCUT_000299	
66	Experian's Declaration of Records Custodian dated February 10, 2023	Produced without Bates Label	
67	Experian Credit Profile of George Calcut	EXP.CALCUT_000321 - EXP.CALCUT_000343	
68	Experian Credit Profile of Geri Calcut	EXP.CALCUT_000344 - EXP.CALCUT_000353	
71	Notice to Plaintiff's regarding Undisclosed Debt dated March 16, 2020	PRMG 00351	
72	PRMG Borrower COVID-19/Coronavirus Certification	PRMG 000443; PRMG 000815	
73	PRMG Borrower COVID-19/Coronavirus Employment	PRMG 000444; PRMG 000804	

	and Debt Certification of George Calcut		
74	PRMG Borrower COVID-19/Coronavirus Employment and Debt Certification of Geri Calcut	PRMG 000445; PRMG 000803	
75	June 14, 2021 Electronic Transfer Authorization from Plaintiffs	CENLAR 000164 – CENLAR 000166	

B. Defendants may offer the following exhibits at trial if the need arises:

Exhibit #	Description	Identified by	Admitted
76	Payment History	CENLAR 000005 - CENLAR 000008	
77	Notice of Assignment dated May 28, 2020	CENLAR 000114 - CENLAR 000116	
78	Letter Enclosing Loan Modification Agreement dated September 27, 2021	CENLAR 000183	
79	Letter regarding inquiry dated September 27, 2021	CENLAR 000184 - CENLAR 000185	
80	Letter regarding servicing transfer to AmeriHome dated October 8, 2021	CENLAR 000188 - CENLAR 000191	
81	Letter confirming Loan was paid in full dated June 7, 2022	CENLAR 000201 - CENLAR 000202	
82	Letter confirming Loan was paid in full dated June 7, 2022	CENLAR 000203 - CENLAR 000204	
83	Payoff Statement dated May 4, 2022	CENLAR 000205 - CENLAR 000208	
84	Payoff Statement dated May 26, 2022	CENLAR 000209 - CENLAR 000212	
85	Letter from Mr. Calcut regarding Credit Reporting Dated August 31, 2021	CENLAR 000233 - CENLAR 000240	
86	June 1, 2021 Disaster Modification Workout Asset Plan	CENLAR 000244 - CENLAR 000250	
87	April 13, 2020 Closing Disclosures	CENLAR 000386 - CENLAR 391	

88	LoanDepot - Residential Loan Application dated October 6, 2021	LoanDepot_Calcut_000077 - LoanDepot_Calcut_000091	
89	New American Funding Loan Application	New American 0120 - New American 0134	
90	United Trust Cash Out Refinance Comparison Certification dated May 10, 2022	United Trust 0050 - United Trust 0051	
91	Audio Recording of Phone Call with Citi Bank	CITIBANK 0068	
92	Audio Recording of Phone Call with Citi Bank	CITIBANK 0069	
93	Transunion Credit Report of George Calcut dated July 17, 2021	TU 3 - TU14	
94	Transunion Credit Report of George Calcut dated August 4, 2021	TU 17 - TU 28	
95	Transunion Credit Report of George Calcut dated August 22, 2021	TU 45 - TU 56	
96	Transunion Dispute Success Report dated August 22, 2021	TU 71	
97	Transunion Credit Report of George Calcut dated September 29, 2021	TU 86 - TU 99	
98	Transunion Credit Report of George Calcut dated October 04, 2021	TU 102 - TU 111	
99	Transunion Credit Report of George Calcut dated October 05, 2021	TU 118 - TU 131	
100	Transunion Credit Report of George Calcut dated October 28, 2021	TU 134 - TU 143	
101	Transunion Credit Report of George Calcut dated November 4, 2021	TU 166 - TU 179	
102	Transunion Credit Report of George Calcut dated November 11, 2021	TU 198 - TU 211	
103	Transunion Credit Report of George Calcut dated December 6, 2021	TU 214 - TU 277	

104	Transunion Credit Report of George Calcut dated December 13, 2021	TU 230 - TU 243	
105	Transunion Credit Report of George Calcut dated December 29, 2021	TU 251 - TU 264	
106	Transunion Credit Report of George Calcut dated February 25, 2022	TU 267 - TU 280	
107	Transunion Credit Report of George Calcut dated October 15, 2022	TU 299 - TU 313	
108	Transunion Credit Report of George Calcut dated January 10, 2023	TU 214 - TU 326	
109	Transunion Credit Report of George Calcut dated February 6, 2023	TU 329 - TU 340	
110	Transunion Dispute Report dated August 17, 2021	TU 342	
111	Transunion Dispute Report dated October 29, 2021	TU 343	
112	Equifax Credit Report for Geri Calcut dated January 25, 2023	CALCUT 001250 – CALCUT 001266	
113	Equifax Credit Report of George Calcut dated January 20, 2023	CALCUT 001217 - CALCUT 001245	
114	Equifax Credit Report of George Calcut dated January 25, 2023	CALCUT 001247 - CALCUT 001270	
115	Equifax Credit Report of George Calcut dated July 6, 2015	CALCUT 001302 - CALCUT 001307	
116	Experian Credit Report of George Calcut dated July 27, 2017	EXP.CALCUT_000001 - EXP.CALCUT_000018	
117	Experian Credit Report of George Calcut dated July 27, 2017	EXP.CALCUT_000019 - EXP.CALCUT_000032	
118	Experian Credit Report of George Calcut dated January 28, 2022	EXP. CALCUT_000145 - EXP.CALCUT_000156	
119	Experian Credit Report of George Calcut dated June 18, 2022	EXP.CALCUT_000181 - EXP.CALCUT_000192	
120	Experian Credit Report of George Calcut dated March 27, 2022	EXP.CALCUT_000193 - EXP.CALCUT_000204	

121	Experian Credit Report of George Calcut dated September 10, 2022	EXP.CALCUT_000221 - EXP.CALCUT_000232	
122	Experian Credit Report of George Calcut dated July 13, 2022	EXP.CALCUT_000235 - EXP.CALCUT_000246	
123	Experian Credit Report of George Calcut dated January 31, 2023	EXP.CALCUT_000273 - EXP.CALCUT_000286	
124	Experian Transaction Log	EXP.CALCUT_000300 - EXP.CALCUT_000311	
125	Experian Disclosure Log	EXP.CALCUT_00312 - EXP.CALCUT_000318	
126	Experian Log Report	EXP.CALCUT_000139 - EXP.CALCUT_000320	
127	Psychological Pathways Therapy Termination Note dated December 2, 2022	PATHWAYS 0029 - PATHWAYS 0032	
128	Honor Health Visit Notes for March 21, 2023	HONOR HEALTH 0017 - HONOR HEALTH 0021	
129	Honor Health Visit Notes dated January 23, 2015	HONOR HEALTH 1287 - HONOR HEALTH1268	
130	Honor Health Visit Notes for Refill dated January 12, 2021	HONOR HEALTH 0522 - HONOR HEALTH 0525	
131	Honor Health Visit Notes for Refill dated February 12, 2021	Honor HEALTH 0508 - HONOR HEALTH 510	
132	Honor Health Visit Notes for Refill dated March 13, 2020	HONOR HEALTH 0726 - HONOR HEALTH 0728	
133	Honor Health Visit Notes for Refill dated March 5, 2020	HONOR HEALTH 0679 - HONOR HEALTH 0685	
134	Honor Health Visit Notes dated September 29, 2020	HONOR HEALTH 0563 - HONOR HEALTH 0581	
135	Honor Health Visit Notes for Refill dated March 31, 2021	HONOR HEALTH 0505 - HONOR HEALTH 0507	
136	Honor Health Visit Notes for Refill dated April 6, 2021	HONOR HEALTH 0502 - HONOR HEALTH 0504	

137	Honor Health Visit Notes dated June 30, 2021	HONOR HEALTH 0409 - HONOR HEALTH 0470	
138	Honor Health Visit Notes dated July 9, 2021	HONOR HEALTH 0403 - HONOR HEALTH 0407	
139	Honor Health Visit Notes dated August 31, 2021	HONOR HEALTH 0388	
140	Honor Health Notes on Laboratory Results dated November 3, 2021	HONOR HEALTH 0360 - HONOR HEALTH 0375	
141	Honor Health Visit Notes dated November 17, 2021	HONOR HEALTH 0348 - HONOR HEALTH 0352	
142	Honor Health Visit Notes dated February 24, 2022	HONOR HEALTH 0311 - HONOR HEALTH 0322	
143	Honor Health Visit Notes for March 20, 2023	HONOR HEALTH 0022 - HONOR HEALTH 0024	
144	Psychological Pathways Psychotherapy Intake Note dated July 25, 2022	PATHWAYS 0005 - PATHWAYS 0008	
145	Psychological Pathways Psychotherapy Progress Note and Treatment Plan dated August 5, 2022	PATHWAYS 0009 - PATHWAYS 0012	
146	Psychological Pathways Psychotherapy Progress Note dated August 12, 2022	PATHWAYS 0013 - PATHWAYS 0014	
147	Psychological Pathways Psychotherapy Progress Note dated August 26, 2022	PATHWAYS 0015 - PATHWAYS 0016	
148	Psychological Pathways Psychotherapy Progress Note and Psychiatry Intake Note dated September 2, 2022	PATHWAYS 0017 - PATHWAYS 0022	
149	Psychological Pathways Psychotherapy Progress Note dated September 9, 2022	PATHWAYS 0023 - PATHWAYS 0024	
150	Psychological Pathways Psychotherapy Progress Note dated September 23, 2022	PATHWAYS 0025 - PATHWAYS 0026	
151	Psychological Pathways Psychotherapy Progress Note dated October 7, 2022	PATHWAYS 0027 - PATHWAYS 0028	

152	Honor Health Certification of Medical Records dated April 4, 2023	HONOR HEALTH 0011	
153	Psychological Pathways Affidavit of Custodian of Records	PATHWAYS 0002	
154	Polara Health Letter from Patricia White	PATHWAYS 0033	
155	Valley Anesthesiology Consultation Note dated March 1, 2023	HONOR HEALTH 0028 - HONOR HEALTH 0033	
156	Text Messages between Kristen Betz and Mrs. Calcut	Betz 000001 - Betz 000009	
157	Honor Health Visit Notes dated February 17, 2017	HONOR HEALTH 1165 – HONOR HEALTH 1183	
158	Honor Health Records	HONOR HEALTH 0001 – HONOR HEALTH 1274	
159	Psychological Pathways Records	PATHWAYS 0001 – PATHWAYS 0033	
160	Credit reporting records for November 5, 2021, December 6, 2021, and January 5, 2022	CENLAR 000650 – CENLAR 000653	
161	June 7, 2022 Paid in Full letter	CENLAR 201 – CENLAR 202	
162	Records produced by Equifax	CALCUT 001214 – CALCUT 001307	
163	Records produced by Experian	EXP.CALCUT 000001 – EXP.CALCUT 000358	
164	Records produced by TransUnion	TU 1 – TU 355	
165	Plaintiffs' Original and Supplemental Responses to Interrogatories and Requests for Admission		

C. Defendants reserve the right to introduce exhibits identified on Plaintiff's exhibit list.

D. Defendants reserve the right to use demonstrative and illustrative exhibits not identified above.

E. Defendants reserve the right to introduce compilations or excerpts of the exhibits identified above as separate exhibits.

1 F. Defendants reserve the right to introduce documents produced by any party in
2 discovery.

3 G. Defendants reserve the right to introduce exhibits not identified above for purposes
4 of impeachment, rebuttal, or to refresh the recollection of any witness called to testify at
5 trial.
6

7 DATED this 5th day of June, 2023.
8

9 Respectfully submitted,

10 s/ G. Benjamin Milam

11 CHRISTIAN W. HANCOCK #027744

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15 G. BENJAMIN MILAM (*Admitted Pro Hac Vice*)

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19 BRADLEY ARANT BOULT CUMMING LLP

20 Truist Center

21 214 North Tryon Street

22 Ste 3700

23 Charlotte, NC 28202

24 *Attorneys for Defendants*
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2023, I served the foregoing by electronic mail on the following:

Justin Johanson, Esq.
21920 E. Pegasus Parkway
Queen Creek, Arizona 85142
Phone: (480) 845-2030
Jjohanson1129@gmail.com

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